

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**ICM HOLDINGS, LLC**

**Debtor**

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§  
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§

**CASE NO. 24-33828**

**CHAPTER 11**

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY**  
**BY THE ATTORNEY FOR THE DEBTOR**

The undersigned attorney does hereby certify under penalty of perjury pursuant to Rule 2016(b) of the Bankruptcy Rules of Procedure:

1. That the compensation paid or promised to him for services to be rendered in connection with the case is as follows: Fees will be billed at the following rates:

Robert C. Lane (Partner)	\$595 per hour
Joshua Gordon	\$550 per hour
Associates	\$500 per hour
Paraprofessionals	\$250 per hour

The principal attorney on the file will be Robert C. Lane. Mr. Lane presently bills at a rate of \$595.00 per hour.

2. Per the terms of the Retainer Agreement, the Debtor made multiple payments from June 11, 2024 through August 1, 2024 for financial advice and representation of the Debtor, totaling \$40,000.00. Prior to the filing of this case, LANE consumed \$12,704.50 in Attorney's Fees and \$3,012.70 in expenses from this retainer for the preparation and filing of this case. The remaining retainer balance on hand on the Petition date is \$24,292.80.

3. Affiant has not shared nor agreed to share such compensation with anyone outside of his Firm.

EXECUTED ON THIS THE 21<sup>ST</sup> DAY OF AUGUST 2024

By: /s/Robert C. Lane  
Robert C. Lane

APPROVED:

ICM Holdings, LLC  
/s/ David Yendrey  
David Yendrey, Managing Member